

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
(Cleveland)**

Sophia Parker Studios, Inc.,
trading as WIFE NYC,

Plaintiff,

v.

Alice Temperley MBE, TMLL Ltd. (trading
as Temperley London), Temperley Holdings
Ltd. (t/a Temperley Holdings), Romo Ltd. (t/a
ROMO and/or Romo Group), Romo
(Holdings) Ltd., Romo, Inc. (t/a ROMO
Fabrics and Wallcoverings and ROMO USA,
and Does 1-20, Inclusive,

Defendants.

Case No. 1:24-cv-02086-PAB

Judge Pamela A. Barker

Magistrate Judge Reuben J. Shepherd

DECLARATION OF SARITA JHA

I, Sarita Jha, declare the following:

1. I am familiar with the facts state herein, and if called to testify, would competently testify thereto.
2. I am an American citizen and have served as a board member of Temperley Holdings Ltd. since December 2023. I assumed the role of Interim Chief Executive Officer on March 1, 2025.
3. Temperley Holdings Ltd. is a parent company with two entities, TMLL Ltd. and AVBM Ltd. (collectively, “Temperley London”).
4. Temperley London is a fashion brand specializing in luxury women’s clothing and made-to-order bridal gowns. All Temperley London intellectual property is owned and managed by AVBM Ltd., based in the Isle of Man, a British Crown dependency.

5. TMLL Ltd. is responsible for all business operations of the Temperley London brand and is located in Ilminster, England.
6. Temperley London has no assets, entities, or offices in the United States.
7. Temperley London operates its own retail channels, physical storefronts, and online store. Temperley London's only storefronts are located in the following cities:
 - London, England
 - Ilminster, England
 - Dubai, United Arab Emirates (UAE), operations which are owned by a 3rd party
8. Temperley London collections are released and distributed wholesale to retailers.
9. Temperley London underwent managed administration in 2021 and has since retracted from some markets, though the company has had trade partnerships with U.S. boutique retailers in the following states:
 - New York
 - Texas
 - Florida
 - Arkansas
10. Temperley London maintains relationships with small, independent retailers in Texas, Arkansas and Florida, each with no more than ten locations, typically within the same geographic area.
11. Temperley London does not have any storefronts in the State of Ohio and has never contracted with any retailers there.
12. United States customers can purchase Temperley London products through the company's website, which is owned, managed, and run in the UK. The website allows consumers to

select products, add them to their basket, and pay for them online. The products are shipped through traditional shipping companies, such as DHL and FedEx.

13. Temperley London does not import any products into the United States. The importation process is managed exclusively by retailers or shipping companies.
14. All Temperley London products are shipped directly to retailers or consumers from a local UK warehouse and are not shipped from anywhere in the United States.
15. Temperley London participates in trunk shows hosted by retailers, hosted by the boutique retailers in New York, Texas, California, Arkansas, and Florida.
16. Temperley London has never participated in any trunk shows in Ohio. No Temperley London board member or executive has ever visited Ohio in connection with the company or otherwise.
17. Temperley London's primary markets are the UK and Europe generally, with the UK accounting for sixty (60%) percent of Temperley London's net sales. The United States accounts for only sixteen (16%) percent of Temperley London's net sales, with the handful of online sales to consumers in Ohio accounting for less than one (1%) percent of net sales.
18. Temperley London's minimal United States consumers may be generally described as affluent, cosmopolitan, and residents of large urban centers, such as Miami, Los Angeles, New York City, Houston, Dallas, Palm Beach, and Orange County (CA).
19. Temperley London does not and has never targeted consumers in the Ohio market and has only two recorded sales in the entire state over the last twenty-four (24) months, one in January 2024 and another in November 2023.

20. All Temperley London agency marketing and promotional activities originate in the UK, and digital marketing is managed by platforms such as Meta and Google, wherein Temperley London advertisements are distributed via their black-box algorithms.
21. Temperley London's social media pages are managed by e-commerce support personnel, with minimal engagement with other users. Temperley London does not collect or analyze social media and marketing engagement data for insights on United States customers.
22. Temperley London does not strategically time posts for United States time-zones and United States engagement, though its Instagram page does link users to purchase company products.
23. No Temperley London entity has ever been involved in United States litigation prior to this lawsuit.
24. No Temperley London entity has ever been accused of copyright infringement in the United States or anywhere else, nor has any asserted such claims against others.
25. No Temperley London entity owns or leases any real property in the United States nor does any entity hold any assets, licenses, or bank accounts there, though AVBM Ltd., an Isle of Man entity, has applied for United States trademark registrations.

Dated: May 26, 2025



SARITA JHA